

# **Programmatic and Financial Monitoring Guide For Arkansas Federal Programs 2018 - 2019**

**Draft until approved**

**Arkansas Department of Education  
Division of Public School Accountability  
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## I. Introduction

This Federal Programs Programmatic and Fiscal Monitoring Guide was developed to provide a comprehensive review of the federal programs monitoring processes and tools across federal granting authorities. The purpose of this tool is to provide uniform guidance for subrecipient monitoring. It is intended to be used by the Arkansas Department of Education (ADE) as a guide during subrecipient monitoring programs and should be used in conjunction with any Local Educational Agency (LEA) risk assessments. Risk assessments, in conjunction with this monitoring guide, provide LEAs and State Education Agencies (SEAs) determinations if grant purposes are being met, the identification of programs before monitoring or an audit, clarification of program requirements, and program expectations. Not all federal programs or items are applicable to all recipients. Items that do not apply are marked as “Not Applicable.”

## II. Monitoring

Monitoring is the regular and systematic examination of a state’s administration and implementation of a federal education grant, contract, or cooperative agreement. Monitoring the use of federal funds, in accordance with 2 C.F.R. §200.300, assures compliance with applicable federal requirements and ensures that all children have an equitable opportunity to obtain a high-quality education. Monitoring assesses the extent to which states provide leadership and guidance to LEAs and schools in the implementation of policies and procedures that comply with the statutes and regulations of all participating federal programs. The monitoring process is designed to assess the degree to which program requirements are being fulfilled. In addition, it provides an opportunity for the ADE to provide technical assistance and guidance to LEA’s in order to strengthen their program administration and improve the quality of programs and projects being implemented. Additionally, this process meets the requirement that the LEA permits the ADE and Legislative/private auditors access to records and financial statements as required by 2 C.F.R. §200.331. Additionally the ADE must:

- Verify the appropriate terms and conditions concerning closeout of the subaward.
- Evaluate each LEA’s risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring may include consideration of such factors as:
  - (1) The LEA’s prior experience with the same or similar subawards;
  - (2) The results of previous audits including whether or not the subrecipient receives a Single Audit in accordance with Subpart F—Audit Requirements of this Part, and the extent to which the same or similar subaward has been audited as a major program;
  - (3) The subrecipient has new personnel or new or substantially changed systems; and
  - (4) The monitoring of the activities as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved.

- ADE monitoring of the LEA must include:
  - (1) Reviewing financial and programmatic reports required by the pass-through entity.
  - (2) Ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient from the pass-through entity detected through audits, on-site reviews, and other means.
  - (3) Issuing a management decision for audit findings pertaining to the Federal award provided to the subrecipient from the pass-through entity as required by 2 C.F.R. § 200.521 Management decision.
- Depending upon the pass-through entity's assessment of risk posed by the subrecipient the following monitoring tools may be useful for the pass-through entity to ensure proper accountability and compliance with program requirements and achievement of performance goals:
  - (1) Providing subrecipients with training and technical assistance on program-related matters
  - (2) Performing on-site reviews of the LEA's program operations
  - (3) Arranging for agreed-upon engagements as described in 2 C.F.R. § 200.425 Audit services
  - (4) Verify that every subrecipient expends Federal awards during the respective fiscal year or period of performance
  - (5) Consider whether the results of the LEA's audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to the pass-through entity's own records
  - (6) Consider taking enforcement action against noncompliant subrecipients as described in 2 C.F.R. § 200.338 Remedies for noncompliance
- Additional risk factors may be identified by ADE.

## **A. Tiered Monitoring Process and Procedures**

Districts will be identified to participate in ADE's monitoring process based on relative programmatic and/or fiscal risk(s). ADE's monitoring process will leverage a collaborative, cross-program approach to provide support to districts. These supports will be designed to integrate programmatic and fiscal data to address areas in need of improvement. The monitoring process is designed to assess the degree to which program requirements are being fulfilled so the SEA can make recommendations when appropriate. In addition, it provides an opportunity for the SEA to provide technical assistance and guidance to LEAs in order to strengthen their program administration and improve the quality of programs and projects being implemented. As a pass-through agency for federal funds, ADE is required to conduct compliance reviews to ensure that subgrants of federal program funds to LEAs are used in accordance with the purposes of the authorizing statute (2 C.F.R. § 200.331). LEAs will have an opportunity to receive guidance and technical assistance through the tiered monitoring process. From this process, the LEA will be informed of the grant status by notice of substantial compliance, request for clarification of information, or additional data as needed for review.

### **1. Tier 1 - Desk Monitoring Process**

Desk monitoring begins an annual Tier 1 review of federal grant applications, including budgets, for each of the federally funded educational entitlement programs. LEAs submit grant applications and accompanying documents to the ADE through Indistar. Based on this desk monitoring, LEAs will be notified when a grant application is substantially compliant or a request will be made to the LEA for additional information. This request will be made in order to achieve clarifying information regarding portions of the application or budget and to reveal the possibility of a potential area of non-compliance. LEAs will have an opportunity to receive guidance and technical assistance. (See Appendix B for Desk Monitoring Checklists pages 64-79)

### **2. Tier 2 - Request Additional Information**

The LEA will be notified in the form of a corrective action letter specifically informing the LEA of content within the program description and/or budgets which do not meet the necessary standards to achieve substantial compliance. The LEA will be asked to address the items contained within the corrective action letter and submit the necessary additional information. These newly submitted documents will once again be desk monitored in an effort to ascertain the LEA's compliance status. It is recognized, and expected, that the LEA may require technical assistance.

### **3. Tier 3 - Deeper Dive into Data or Evidence**

In the event that a deeper dive becomes necessary (identified risk, request, sampling), the LEA will be notified in writing of the specific circumstances and the recommended remedies required to move the grant to a point of substantial compliance. This may require the submission of additional documentation from the LEA, more intensive technical assistance, a site visit by ADE staff, or other remedies determined in consultation with the LEA. A risk analysis will be completed yearly for each LEA. (See Appendix C for Programmatic Risk Analysis pages 80-85)

## 4. Tier 4 - On-Site Monitoring Process

LEAs may be visited based on identified risks, a sampling, a predetermined cycle, difficulty resolving issues during desk monitoring, and/or audits. LEAs will be contacted regarding on-site monitoring to confirm the date and time of the site visit. More intensive technical assistance will be provided. An on-site monitoring may require the submission of additional documentation from the LEA.

### **During On-Site Review:**

**Entrance Conference:** An entrance conference is held with the superintendent and other district personnel. The meeting acquaints LEA staff with the ADE team and provides an opportunity to familiarize district staff with the purpose and goals of the visit.

**Review:** Interviews with appropriate program personnel or staff members and a review of additional documentation gathered is conducted on-site. This may also include interviews with non-public school staff, multi-district consortium members, parents and/or other stakeholders.

**Exit Conference:** The monitoring team will hold an exit conference with the superintendent and other district personnel. The ADE monitoring team will summarize the monitoring activities, the potential findings and the timeline for developing the monitoring report.

Within ten (10) business days of the exit conference, the monitoring report will be issued to the superintendent. The LEA will have ten (10) business days to complete and submit the necessary documentation listed in the corrective actions. Documentation/evidence received from the LEA during this time will be reviewed for compliance. If all documentation is deemed complete and compliant, a final compliance letter will be issued within thirty (30) business days of the exit conference.

An LEA that does not respond to the report within the established timeline or fails to comply, the Federal awarding agency or pass-through entity may take one or more of the following actions, as appropriate in the circumstances (2 C.F.R. § 200.338 Remedies for Non-compliance):

- (a) Temporarily withhold cash payments pending correction of the deficiency by the non-Federal entity or more severe enforcement action by the Federal awarding agency or pass-through entity.
- (b) Disallow (that is, deny both use of funds and any applicable matching credit for) all or part of the cost of the activity or action not in compliance.
- (c) Wholly or partly suspend or terminate the Federal award.
- (d) Initiate suspension or debarment proceedings as authorized under 2 C.F.R. §180 et seq. and Federal awarding agency regulations (or in the case of a pass-through entity, recommend such a proceeding be initiated by a Federal awarding agency).
- (e) Withhold further Federal awards for the project or program.

(f) Take other remedies that may be legally available which may include a designated level of fiscal distress.

Upon taking any remedy for non-compliance, the Federal awarding agency must provide the non-Federal entity an opportunity to object and provide information and documentation challenging the suspension or termination action, in accordance with written processes and procedures published by the Federal awarding agency. The Federal awarding agency or pass-through entity must comply with any requirements for hearings, appeals or other administrative proceedings to which the non-Federal entity is entitled under any statute or regulation applicable to the action involved. (2 C.F.R. § 200.341 Opportunities to object, hearings and appeals)

## B. Grant Descriptions

**Title I, Part A - Improving the Academic Achievement of the Disadvantaged** - The purpose of this title is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. Section 1001. (20 U.S.C. §6301)

**Title I, Part C - Education of Migratory Children** - The purposes of this part are as follows: (1) to assist States in supporting high-quality and comprehensive educational programs and services during the school year and, as applicable, during summer or intersession periods, that address the unique educational needs of migratory children. (2) To ensure that migratory children who move among the States are not penalized in any manner by disparities among the States in curriculum, graduation requirements, and challenging State academic standards. (3) To ensure that migratory children receive full and appropriate opportunities to meet the same challenging State academic standards that all children are expected to meet. (4) To help migratory children overcome educational disruption, cultural and language barriers, social isolation, various health-related problems, and other factors that inhibit the ability of such children to succeed in school. (5) To help migratory children benefit from State and local systemic reforms. Title I, Part C, Section 1301.

**Title I, Part D - Prevention and Intervention Programs for Children and Youth Who Are Neglected, Delinquent or At-Risk** - (1) To improve educational services for children and youth in local, tribal, and state institutions for neglected or delinquent children and youth so that such children and youth have the opportunity to meet the same challenging state academic standards that all children in the state are expected to meet (2) to provide such children and youth with the services needed to make a successful transition from institutionalization to further schooling or employment; and (3) to prevent at-risk youth from dropping out of school, and to provide dropouts, and children and youth returning from correctional facilities or institutions for neglected or delinquent children and youth, with a support system to ensure their continued education. Title I, Part D, Section 1401.

**Title II, Part A - Supporting Effective Instruction** - The purpose of this title is to provide grants to State educational agencies and subgrants to local educational agencies to (1) increase student achievement consistent with the challenging State academic standards; (2) improve the quality and effectiveness of teachers, principals, and other school leaders; (3) increase the number of teachers, principals, and other school leaders who



are effective in improving student academic achievement in schools; and (4) provide low-income and minority students greater access to effective teachers, principals, and other school leaders. Title II, Part A, Section 2001.

**Title III, Part A - Language Instruction for Limited English Proficient and Immigrant Students** - The purposes of this part are intended (1) to help ensure that English learners, including immigrant children and youth, attain English proficiency and develop high levels of academic achievement in English; (2) to assist all English learners, including immigrant children and youth, to achieve at high levels in academic subjects so that all English learners can meet the same challenging State academic standards that all children are expected to meet; (3) to assist teachers (including preschool teachers), principals and other school leaders, State educational agencies, local educational agencies, and schools in establishing, implementing, and sustaining effective language instruction educational programs designed to assist in teaching English learners, including immigrant children and youth; (4) to assist teachers (including preschool teachers), principals and other school leaders, State educational agencies, and local educational agencies to develop and enhance their capacity to provide effective instructional programs designed to prepare English learners, including immigrant children and youth, to enter all-English instructional settings; and (5) to promote parental, family, and community participation in language instruction educational programs for the parents, families, and communities of English learners. Title III, Part A, Section 3102.

- a. **Recent Immigrant Grant** - The purpose of this part is to provide enhanced instructional opportunities for immigrant children and youth, which may include - (1) family literacy, parent and family outreach, and training activities designed to assist parents and families to become active participants in the education of their children; (2) recruitment of, and support for, personnel, including teachers and paraprofessionals who have been specifically trained, or are being trained, to provide services to immigrant children and youth; (3) provision of tutorials, mentoring, and academic or career counseling for immigrant children and youth; (4) identification, development, and acquisition of curricular materials, educational software, and technologies to be used in the program carried out with awarded funds; (5) basic instructional services that are directly attributable to the presence of immigrant children and youth in the local educational agency involved, including the payment of costs of providing additional classroom supplies, costs of transportation, or such other costs as are directly attributable to such additional basic instructional services; (6) other instructional services that are designed to assist immigrant children and youth to achieve in elementary schools and secondary schools in the United States, such as programs of introduction to the educational system and civics education; and (7) activities, coordinated with community-based organizations, institutions of higher education, private sector entities, or other entities with expertise in working with immigrants, to assist parents and families of immigrant children and youth by offering comprehensive community services. Title III, Section 3115(e)(1)(A-G).

**Title IV, Part A - Student Support and Academic Enrichment (SSAE)** - The purpose of this subpart is to improve student's academic achievement by increasing the capacity of States, local educational agencies, schools, and local communities to: 1) provide all students with access to a well-rounded education, 2) improve school conditions for student learning, and 3) improve the use of technology in order to improve the academic achievement and digital literacy of all students. Title IV, Part A Section 4101.

**Title IV, Part B - 21st Century Community Learning Centers (21st CCLC)** - The purpose of this part is to provide opportunities for communities to establish or expand activities in community learning centers that (1) provide opportunities for academic enrichment, including providing tutorial services to help students, particularly students who attend low-performing schools, to meet the challenging State academic standards; (2) offer students a broad array of additional services, programs, and activities, such as youth development activities, service learning, nutrition and health education, drug and violence prevention programs, counseling programs, arts, music, physical fitness and wellness programs, technology education programs, financial literacy programs, environmental literacy programs, mathematics, science, career and technical programs, internship or apprenticeship programs, and other ties to an in-demand industry sector or occupation for high school students that are designed to reinforce and complement the regular academic program of participating students; and (3) offer families of students served by community learning centers opportunities for active and meaningful engagement in their children's education, including opportunities for literacy and related educational development. Title IV, Part B Section 4201.

**Title V, Part B - Rural Education Achievement Program** - The purpose of this part is to address the unique needs of rural school districts that frequently: (1) lack the personnel and resources needed to compete effectively for Federal competitive grants; and (2) receive formula grant allocations in amounts too small to be effective in meeting their intended purposes. Title V, Part B Section 5201 and 5202.

**Title IX, Part A of the McKinney-Vento Homeless Assistance Act** - guarantees educational rights and supports for students experiencing homelessness, and seeks to remove any barriers these students may face in succeeding in school. The McKinney-Vento Act is designed to address the challenges that homeless children and youths have faced in enrolling, attending, and succeeding in school. 42 U.S.C. § 11431 et seq.

# **III. Programmatic and Financial Monitoring On-Site Tool**

## **For**

### **Arkansas Federal Programs**

#### **2018 - 2019**

**Draft until approved**

**Arkansas Department of Education**  
**Division of Public School Accountability**  
**Four State Capitol Mall**  
**Little Rock, Arkansas 72201**  
<http://www.arkansased.gov>

**LEA:** \_\_\_\_\_

**Monitoring Date:** \_\_\_\_\_

<b>LEA NAME</b>		<b>LEA Number</b>	<b>Monitoring Visit Date:</b>								
<b>LEA Address</b>	<b>City</b>	<b>State</b>	<b>Zip Code</b>								
<b>Phone:</b>	<b>Fax:</b>	<b>Email:</b>									
<b>LEA Superintendent</b>											
<b>LEA Federal Programs Coordinator</b>											
<b>Others in Attendance and Title</b>											
<b>ADE Team Members:</b> <table> <tr> <td><b>Team Leader:</b></td> <td><b>Date:</b></td> </tr> <tr> <td><b>Team Member:</b></td> <td><b>Date:</b></td> </tr> <tr> <td><b>Team Member:</b></td> <td><b>Date:</b></td> </tr> <tr> <td><b>Team Member:</b></td> <td><b>Date:</b></td> </tr> </table>				<b>Team Leader:</b>	<b>Date:</b>	<b>Team Member:</b>	<b>Date:</b>	<b>Team Member:</b>	<b>Date:</b>	<b>Team Member:</b>	<b>Date:</b>
<b>Team Leader:</b>	<b>Date:</b>										
<b>Team Member:</b>	<b>Date:</b>										
<b>Team Member:</b>	<b>Date:</b>										
<b>Team Member:</b>	<b>Date:</b>										

## A. Programmatic Monitoring Indicators

<b>OVERARCHING REQUIREMENTS</b> Programmatic TITLE I, PART A; TITLE I, PART D; TITLE II, PART A; TITLE III, PART A; TITLE IV, PART A; TITLE V, PART B			
Monitoring Indicators		ADE USE ONLY	
		Met Requirements Describe Evidence	Did Not Meet Requirements Describe Current Practice
1	LEA maintains security that ensures all applicable technology, networks, passwords and student data is safe, secure and password protected. Section 8545(a)(1-4)	Provide evidence of the LEA's information technology security plan and/or Disaster Recovery Plan which includes protection for student privacy.	

OVERARCHING REQUIREMENTS					
Programmatic TITLE I, PART A; TITLE I, PART D; TITLE II, PART A; TITLE III, PART A; TITLE IV, PART A; TITLE V, PART B					
PRIVATE SCHOOLS		<input type="checkbox"/> <i>Not Applicable</i>			
Monitoring Indicators		Acceptable LEA Evidences		ADE USE ONLY	
				Met Requirements Describe Evidence	Did Not Meet Requirements Describe Current Practice
2	<p>Equitable Services consultation process and meetings between the LEA and private school officials that occur (excluding Title V, Part B):</p> <p>a) <b>prior</b> to the LEA making any decisions regarding the involvement in participating Title programs of eligible private school students, teachers, and families.</p> <p>b) <b>throughout</b> the implementation and assessment of the participating Title programs and services for private school students.</p> <p>Sections 1117(b)(1)(A-L), 8501(c)(1)(A-H)</p>	<p>Affirmation of Consultation and Intent to Participate will be verified in Indistar.</p> <p>Provide evidence of letters or phone logs to private schools documenting contact efforts.</p>			

3	<p>The LEA ensures that private schools are offered the same monitoring and inventory controls for Federally-owned property as public school sites.</p> <p>Uniform Guidance: 2 C.F.R. §§200.312(a) and 200.313 (2)(A)</p>	<p>Provide an up to date equipment inventory listing for any equipment held at private schools.</p> <p>Provide evidence that an inventory of these items was performed at least once every 2 years.</p>		
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<b>Title I, Part A</b> <b>Source of Fund 6501</b> <b>Improving the Academic Achievement of the Disadvantaged</b> <b>Programmatic</b>				
Monitoring Indicators		Acceptable LEA Evidences	ADE USE ONLY	
			Met Requirements Describe Evidence	Did Not Meet Requirements Describe Current Practice
1	LEA Title I committee selects a diverse group of members. Section 1112(a)(1)(A)	List the names of committee members and their titles		
2	Supplemental activities must align with the comprehensive needs assessment. This should include multiple data sources. Sections 1112(b)(1)(A-D), 1114(b)(6), 1115, 1116	Provide the supplemental activities to be implemented and aligned with the comprehensive needs assessment. List the data sources used to determine those activities.		
3	The LEA's Parent and Family Engagement Plan includes strategies for the inclusion of parents of private school children. Sections 1116, 1117(a)(1)(B)	Provide evidence of Parent and Family Engagement Plan for the inclusion of parents of private school children. (Example: Sign-in sheets)  Provide strategies that were used to support private school parents and children.		
4	Required components of the Schoolwide Plan Section 1114(b)(1-7)	Provide evidence of the support and procedures for Title I Schoolwide Plan Development.  Provide evidence of the following four (4) components of the Schoolwide Plan: 1) Needs Assessment 2) Schoolwide Reform Strategies 3) Activities to Ensure Mastery 4) Coordination and Integration		



5	Requirements of Targeted Assistance Plan Section 1115	Provide evidence of one or more of the following: 1) Student eligibility 2) Selection criteria ranked by greatest need 3) Multiple assessment data 4) Evidenced based strategies 5) Professional development		
6	Title I Targeted Assistance Programs Student Eligibility Criteria Section 1115(c)	Provide criteria for Targeted Assistance Program Student Eligibility.		
7	The services of a targeted assistance program under this section may be delivered by nonprofit or for-profit external providers with expertise in using evidence-based or other effective strategies to improve student achievement. Section 1115(2)(h)	Provide evidence of one or more of the following: 1) Student eligibility 2) Selection criteria ranked by greatest need 3) Multiple assessment data 4) Evidenced based strategies 5) Professional development 6) Evidence of vetting process used to select external providers 7) Evidence of evaluation of external provider(s) effectiveness		
<b>Parent and Family Engagement, Title I, Part A</b> <b><input type="checkbox"/> As Applicable</b>				
1	LEA ensures the Title I school Parent and Family Engagement Plan has been implemented and that each school has carried out the fourteen requirements to build parents' capacity. Sections 1116(a)(2)(C); 1116 (e)(1-14)	Provide agendas, sign-in sheets, minutes, notification of parent meetings and signed documents that verify implementation of the Parent and Family Engagement Plan.  Provide evidence of the following: 1) Assistance to parents of children served by the school or local educational agency,		

		<p>as appropriate, in understanding such topics as the challenging State academic standards, State and local academic assessments, the requirements of this part, and how to monitor a child's progress and work with educators to improve the achievement of their children;</p> <p>2) Materials and training to help parents to work with their children to improve their children's achievement, such as literacy training and using technology (including education about the harms of copyright piracy), as appropriate, to foster parental involvement;</p> <p>3) Educate teachers, specialized instructional support personnel, principals, and other school leaders, and other staff, with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school;</p> <p>4) To the extent feasible and appropriate, coordinate and integrate parent involvement</p>		
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		<p>programs and activities with other Federal, State, and local programs, including public preschool programs, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children;</p> <p>5) Ensure that information related to school and parent programs, meetings, and other activities is sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand;</p> <p>Provide examples of components 6-14 as required in Section 1116.</p> <p>1) Involve parents in the development of training for teachers, principals, and other educators to improve the effectiveness of such training;</p> <p>2) Provide necessary literacy training from funds received under this part if the local educational agency has exhausted all other reasonably available sources of funding for such training;</p> <p>3) Pay reasonable and necessary expenses associated with local parental involvement activities, including transportation and</p>		
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		<p>child care costs, to enable parents to participate in school-related meetings and training sessions;</p> <ol style="list-style-type: none"><li>4) Train parents to enhance the involvement of other parents;</li><li>5) Arrange school meetings at a variety of times, or conduct in-home conferences between teachers or other educators, who work directly with participating children, with parents who are unable to attend such conferences at school, in order to maximize parental involvement and participation;</li><li>6) Adopt and implement model approaches to improving parental involvement;</li><li>7) Establish a districtwide parent advisory council to provide advice on all matters related to parental involvement in programs supported under this section;</li><li>8) Develop appropriate roles for community-based organizations and businesses in parent involvement activities;</li><li>9) Provide such other reasonable support for parental involvement activities under this section as parents may request.</li></ol>		
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2	<p>Parent and Family Engagement Plan was developed jointly with parents, agreed upon and disseminated to parents. Sections 1116(a)(2)(A), 1116(b)(1)</p>	<p>Provide Parent and Family Engagement committee meeting sign-in sheets, that clearly identify parents in attendance, to verify that their Parent and Family Engagement Plans were developed jointly with and agreed on with parents.</p> <p>Provide parent signatures to verify that the written Parent and Family Engagement Plan was distributed to parents and family members of participating children.</p> <p>Provide examples of how plans were disseminated.</p>		
3	<p>At the beginning of each school year, the LEA notifies the parents of each student about the right to request information regarding the professional qualifications of the student's classroom teachers and paraprofessionals. Section 1112(e)(1)(A-B)</p>	<p>Provide evidence of Parents Right to Know letter.</p> <p>Provide evidence of letter (if applicable) with parent signatures verifying that they were informed and received timely notification if student has been assigned to or has been taught 4 or more consecutive weeks by a teacher who does not meet applicable state certification or licensure requirements at the grade level and subject area in which the teacher has been assigned. (Annual Title I Meeting agenda and sign-in sheet)</p>		

4	<p>At the beginning of the year, parents of participating students are informed that they have a right to request regular meetings to help formulate suggestions and participate in the decisions made relating to the education of their children. Section 1116(c)(4)(C)</p>	<p>Provide signatures from parents of students receiving Title I services verifying that the Title I school informed them that they had a right to ask for regular meetings to help formulate suggestions and participate in the decisions made about the education of their children. (Annual Title I Meeting agenda and sign-in sheet)</p>		
5	<p>LEA ensures that an annual evaluation of the effectiveness of the Parent and Family Engagement Policy/Plan and activities have been completed for participating schools. Section 1116(a)(2)(D)(i-iii)</p> <p>LEA should use the annual evaluation findings to help improve the Parent and Family Engagement efforts. Section 1116 (a)(2)(E)</p>	<p>Provide evidence of the most recent annual evaluation form for the Parent and Family Engagement Policy/Plan for each school in the district.</p> <p>The evaluation must include the following:</p> <ul style="list-style-type: none"> <li>a) identifies barriers to greater participation (with particular attention to parents who are economic disadvantaged, are disabled, have limited English proficiency, have limited literacy, or are of any racial or ethnic minority background),</li> <li>b) identifies the needs of parents and family members to assist with the learning of their children, including engaging with school personnel and teachers,</li> <li>c) identifies strategies to support successful school and family interactions.</li> </ul>		

		Provide evidence of written documentation on how the findings of the annual evaluation are used to design evidence-based strategies for more effective parental involvement, and to revise, if necessary, the parent and family engagement policies described in this section.		
6	Parents of students receiving Title I services receive information about the school's Title I Program. Sections 1116(c)(4)(B- C), 1116(c)(5)	Provide evidence of Annual Title I Meeting's agenda, sign-in sheets and minutes to verify that each Title I School does the following: <ul style="list-style-type: none"> <li>a) Conduct an Annual Title I Meeting to inform parents of participating students about the school's Title I Program.</li> <li>b) Provide a description and explanation of the curriculum in use at the school.</li> <li>c) Provide information about the forms of academic assessment used to measure student progress.</li> <li>d) Provide information about the achievement levels of the challenging State academic standards.</li> </ul>		
7	Title I school School-Parent Compact to be discussed and agreed upon by the school, parent and the student. It should outline how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership	Provide the file containing evidence of the School-Parent Compact, that has been discussed and agreed upon by all stakeholders, to verify that each Title I school has developed a School-Parent Compact.		

	<p>to help children achieve the State's high standards and is jointly develop with parents for all children receiving Title I services. Describe the school's responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the children served under this part to meet the challenging State academic standards, and the ways in which each parent will be responsible for supporting their children's learning; volunteering in their child's classroom; and participating, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time.</p> <p>Section 1116 (d)(1), (d)(2)(A-D).</p>			
8	<p>Parents of students receiving Title I services must help decide how the set aside funds will be spent.</p> <p>Section 1116 (a)(3)(B)</p>	<p>Provide documents that verify that parent provided input into how the funds set-aside for Parent and Family Engagement were spent. (meeting agenda, meeting minutes, sign-in sheets, surveys).</p>		



9	If applicable, the LEA will submit comments from parents of participating students who are not satisfied with the plans that were developed under Sections 1112 and 1114(b). Sections 1116 (b)(2)(4), 1116 (c)(5)	Provide evidence of correspondence that was submitted to the SEA that includes the comments from parents of students receiving Title I services who are not satisfied with the plans that were developed under Section 1112 and 1114(b).		
10	Parent notifications and information to the parents of English Learner (EL) students in a language that is understandable to the parents. Section 1116	Provide examples of translated documents. Examples may include Parent Right to Know letter, timely notice letter, school parent compact, annual Title I meeting invitation, all correspondence to EL parents.		
<b>Paraprofessionals, Title I, Part A</b>				
1	LEA ensures that paraprofessionals are highly qualified. Section 1112(c)(6)	Provide documentation of compliance from ADE.  Provide highly qualified documentation.		
2	The LEA maintains professional learning opportunities for paraprofessionals. Section 1114(b)(7)(iii)(IV)	Provide professional development plan.  Provide sign-in sheets, agendas, individualized professional development plans, etc.		

Neglected, Title I, Part A				
1	LEA provides evaluation for Neglected, Title I, Part A. Section 1431	Provide evidence of a process for ongoing monitoring of the program effectiveness using evaluation results from the curriculum model or instructional program in use. Examples may include assessments which are aligned to the curriculum and disaggregated data used to guide instruction (charts, graphs etc.).		
2	LEA provides professional development opportunities for staff on Neglected, Title I, Part A. Section 1414(c)(10).	Provide sign-in sheets, agendas, and minutes of professional development opportunities specific to Title I, Part A Neglected program.		

<b>Title I, Part D</b> <b>Source of Fund 6510</b> <b>Delinquent</b> <b>Programmatic</b> <input type="checkbox"/> <i>Not Applicable</i>				
Monitoring Indicators		Acceptable LEA Evidences	ADE USE ONLY	
			Met Requirements Describe Evidence	Did Not Meet Requirements Describe Current Practice
1	LEA provides instruction that is aligned with state's standards and accountability system to Delinquent children and youth. Section 1414 (a)(1)(B)(C)	Provide a job description for the transition coordinator (if applicable).  Provide policies, procedures, and samples of instructional materials that indicate students are held to the same standards and accountability system required of all students.		
2	Services provided to assist in the transition of delinquent children and youth back to the school or workforce environment. Section 1418(a)(2)	Provide policies and procedures that the transition of students to regular public school programming or workforce situations is being conducted.  Verify the appropriate use of 15%-30% fund reservation.  Examples may include a list of transition programs, students under age 20 receiving a diploma, and partnerships facilitating technical education and career education.		

3	LEA has a dropout prevention program that targets at-risk or delinquent children and youth. Section 1414(c)(8)	<p>Provide documentation that the dropout prevention program has been shared with parents/guardians.</p> <p>Provide sign-in sheets and agendas of professional development regarding dropout prevention.</p> <p>Provide samples of the instructional materials used to facilitate dropout prevention.</p>		
4	LEA has procedures for monitoring delinquent program funds. Sections 1415	<p>Provide job descriptions and list of employees paid with Part D Funds.</p> <p>Provide a list of all equipment inventoried.</p> <p>Provide time records for all staff paid with Part D funds.</p> <p>Provide invoices, purchase orders, etc.</p>		
5	LEA collects data on children and youth after they are released Sections 1426(2)	<p>Provide written procedures for student data collection which must include:</p> <ol style="list-style-type: none"> <li>1) The number of children and youth returning or to school.</li> <li>2) A list of those students attaining a regular high school diploma or its recognized equivalent.</li> <li>3) A list of students that have attained employment after such children and youth are released.</li> </ol>		

6	Procedures utilized to meet the needs of delinquent students that have a disability, in order to meet an existing Individualized Educational Program (IEP) requirements. Section 1414(c)(15)(A)(B)	<p>Provide sample documentation of evidence of modifications.</p> <p>Provide records related to parent meetings regarding modifications.</p> <p>Provide evidence of all policies used by the agency and disseminated to parents regarding programming for students with disabilities.</p>		
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<b>Title II, Part A</b> <b>Source of Fund 6756</b> <b>Preparing, Training, and Recruiting High-Quality Teachers, Principals, and Other School Leaders</b> <b>Programmatic</b> <input type="checkbox"/> <b>Not Applicable</b>				
Monitoring Indicators		Acceptable LEA Evidence	ADE USE ONLY	
			Met Requirements Describe Evidence	Did Not Meet Requirements Describe Current Practice
1	If applicable, describe how Class-Size Reduction (CSR) needs are determined. Section 2103(b)(3)(D)	Provide the written methodology used to determine Class-Size reduction. (See Appendix D for Commissioner's Memo COM-18-077 pages 86-87)		
2	Professional development activities the LEA selects meet the purpose of Title II, Part A by containing the following: a) increases student achievement consistent with the challenging State academic standards; Section 2103(b)(3)(E) b) improves the quality and effectiveness of teachers, principals, and other school leaders; Section 2103(b)(3)(E) c) increases the number of teachers, principals, and other school leaders who are effective in improving student academic achievement in schools; and Section 2103(b)(3)(E) d) provides low-income and minority students greater access to effective teachers, principals, and other school leaders. Section 2103(b)(3)(B)	Provide documentation of professional development needs based on evidenced-based practices. (See Appendix D for Commissioner's Memo COM-18-077 pages 86-87)  Provide evidence of how data driven professional development is used to decrease the achievement gap between low and higher performing students. (See Appendix D for Commissioner's Memo COM-18-077 pages 86-87)  Provided a list of teachers receiving incentives and type of incentives. Section 2103 (b)(B)(3)(ii)		

3	Professional development activities that meet the purpose of Title II, Part A address the learning needs of all students, including children with disabilities, English learners and gifted and talented students. Sections 2103(b)(3)(F), 2103(b)(3)(J)	Provide evidence of how data driven professional development is used to meet the learning needs of children with disabilities, English learners, and gifted and talented students.		
4	The LEA provides meaningful consultation with teachers, principals, other school leaders, paraprofessionals, support personnel, parents, family, community partners, and stakeholders Sections 2102(b)(3)	Provide documentation of specific Title II, Part A consultation criteria.  Provide sign in sheets, agendas, and minutes of consultation including stakeholder representation.		
5	The LEA consults with private schools within district boundaries to provide resources for professional development to the private school teachers if the private school chooses to participate. Section 8501	Provide documentation of specific Title II, Part A consultation criteria.  Provide sign-in sheets, agendas, and minutes of consultation including stakeholder representation.		

<b>Title III, Part A</b> <b>Source of Fund 6761</b> <b>Language Instruction for English Learners and Immigrant Students</b> <input type="checkbox"/> <i>Not Applicable</i>				
Monitoring Indicators		Acceptable LEA Evidence	ADE USE ONLY	
			Met Requirements Describe Evidence	Did Not Meet Requirements Describe Current Practice
1	Title III funds are used as supplement for programs for limited English proficient children and immigrant children and youth and in no case to supplant. Section 3115(g)	Provide expenditure reports, classroom schedules/rosters, invoices, purchase orders.  Provide documentation that supports that Title III activities were used for supplemental activities and not to support a district's general operating budget or programs previously funded with local or other operating funds.		
2	LEA has identified English Learners for participation as required by Section 1112(e)(3)(A)	Provide evidence of completed home language surveys and assistance to parents, who are completing the home language survey, on understanding the purpose of the home language surveys.  Provide a verified list of eligible English Learners (EL).  Provide documentation demonstrating information gathered from home language survey.		



		Provide a list of all K-12 students with primary home language and native language		
3	LEA follows Exit Protocol for initial identification and placement of eligible EL students ages 3 to 21. Section 1112(e)(3)(vi)	Provide documentation of exit protocol which includes: <ol style="list-style-type: none"> <li>1. Expected rate of transition from such program into classrooms that are not tailored for English learners</li> <li>2. Expected rate of graduation from high school (including four-year adjusted cohort graduation rates and extended-year adjusted cohort graduation rates for such program) if funds under this part are used for children in high schools</li> </ol>		
4	LEA annually assesses the English proficiency of all ELs in grades K-12. Section 1111(b)(2)(G)(i)	Provide: <ol style="list-style-type: none"> <li>1) Documentation of how many EL students were not assessed and the reason for not testing.</li> <li>2) Evidence that EL students referred to other programs are annually assessed with ELPA21 assessment.</li> <li>3) Documentation that EL parents are informed of the ELPA21 assessment testing requirements for all EL students.</li> </ol>		

5	<p>LEA ensures that the language assistance program and the supplemental language instruction educational programs (LIEP) focus on the development of English language proficiency and student academic attainment of the state content standards.</p> <p>Sections 3115(c)(1)(A-B)</p>	<p>Provide:</p> <ol style="list-style-type: none"> <li>1) District's plan for implementation of State Standards process with ELP standards.</li> <li>2) The process of developing English language proficiency (ELP) and content curriculum that integrates components of ELPA21.</li> <li>3) Evidence of ELP Standards being available to staff. (Examples may include sign-in sheets from ELP standards training)</li> <li>4) Documentation of training provided to all EL and general education teachers of English learners and administrators at the elementary, middle school, and high school level.</li> <li>5) Documentation of feedback from an administrator in a EL classroom observation.</li> </ol>		
6	<p>The LEA ensures that ELs are included in all state content and ELP assessments.</p> <p>Section 1111(b)(2)(I)(II)(ii)</p>	<p>Provide evidence that all English learners were tested.</p>		

7	<p>Individual Learning Plans ILP/LPAC (Language Proficiency Assessment Committee Resources) have been created for all LEP students. All teachers serving LEP students have received a copy of the student(s) ILP, and it is being implemented on a daily basis to increase English Proficiency.</p> <p>Section 3115(c)(1)</p>	<p>Provide:</p> <ol style="list-style-type: none"> <li>1) Student LPAC/ILPS Forms.</li> <li>2) Signatures of Administrators, Classroom Teachers, ESOL Coordinator and others in the LPAC Committee.</li> <li>3) Sampling of LPAC/ILPs students' files.</li> </ol>		
8	<p>LEAs monitors students that achieved a "proficient" score on annual proficiency test</p> <p>Section 3113(b)(3)(B)</p>	<p>Provide:</p> <ol style="list-style-type: none"> <li>1) List of school EL students currently in monitoring</li> <li>2) Monitoring forms/documentation of students in monitoring</li> </ol>		
9	<p>Title III required professional development has been provided to EL and general education classroom teachers, principals, administrators, and other school or community-based organizational personnel.</p> <p>Section 3115(c)(2)</p>	<p>Provide sign-in sheets and agendas that professional development has been provided to the general education classroom teachers, principals, administrators, other school community-based organizational personnel, and English Speakers of Other Languages (ESOL) Coordinator.</p>		

10	LEA has an effective means of parent outreach to EL parents (programs, activities, training, and family literacy). The district has evidence that EL parents are involved stakeholders. Sections 3115(c)(3)(A); 3116(b)(3)	Provide evidence how the LEA promotes parent, family, and community engagement in the education of English learners. Examples could include calendar of events, topics, and sign-in sheets.		
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<b>Recent Immigrant Grant</b> Source of Fund 6758 Immigrant Children and Youth Grant <input type="checkbox"/> <i>Not Applicable</i>				
Monitoring Indicators		Acceptable LEA Evidence	ADE USE ONLY	
			Met Requirements Describe Evidence	Did Not Meet Requirements Describe Current Practice
1	LEA shall use funds to pay for activities that provide enhanced instructional opportunities for immigrant children and youth, Section 3115(e)(1)(A-G)	Provide (when applicable): 1. Family literacy, parent and family outreach, and training activities designed to assist parents and families to become active participants in the education of their children; 2. Recruitment of, and support for, personnel, including teachers and paraprofessionals who have been specifically trained, or are being trained, to provide services to immigrant children and youth; 3. Provision of tutorials, mentoring, and academic or career counseling for immigrant children and youth; 4. Identification, development, and acquisition of curricular materials, educational software, and technologies to be used in the program carried out with awarded funds 5. Basic instructional services that are directly attributable to the presence of immigrant children and youth in the local educational agency		

		<p>involved, including the payment of costs of providing additional classroom supplies, costs of transportation, or such other costs as are directly attributable to such additional basic instructional services;</p> <p>6. Other instructional services that are designed to assist immigrant children and youth to achieve in elementary schools and secondary schools in the United States, such as programs of introduction to the educational system and civics education;</p> <p>7. Activities, coordinated with community-based organizations, institutions of higher education, private sector entities, or other entities with expertise in working with immigrants, to assist parents and families of immigrant children and youth by offering comprehensive community services.</p>		
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<b>TITLE IV, Part A</b> <b>Source of Fund 6786</b> <b>Student Support and Academic Enrichment</b> <b>Programmatic</b> <input type="checkbox"/> <i>Not Applicable</i>				
Monitoring Indicators		Acceptable LEA Evidence	ADE USE ONLY	
			Met Requirements Describe Evidence	Did Not Meet Requirements Describe Current Practice
1	LEA shall develop its application through consultation with parents, teachers, and other stakeholders with demonstrated expertise in programs and activities designed to meet the purpose of this subpart. Section 4106(c)	Provide evidence of dated agendas, minutes, sign-in sheets, notes of consultation with parents, teachers, principals, other school leaders, specialized instructional support personnel, students, community-based organizations, and local government representatives.		

<b>TITLE IV, Part B</b> <b>21st Century Community Learning Centers (21st CCLC)</b> <b>Source of Fund 6441</b> <b>Programmatic</b> <input type="checkbox"/> <i>Not Applicable</i>				
Monitoring Indicators		Acceptable LEA Evidence	ADE USE ONLY	
			Met Requirements Describe Evidence	Did Not Meet Requirements Describe Current Practice
1	Program site is safe, clean and easily accessible for program activities and the number of students. Section 4204(b)(2)(A)(i)	Inspection of program facility.		
2	Inventory purchased with grant funds is identified with a 21st CCLC label. Uniform Guidance: 2 C.F.R. §200.313(d)(1)	Inspection of inventory items.		



<b>TITLE IX, Part A</b> <b>Source of Fund 3355</b> <b>McKinney-Vento Education for Homeless Children and Youths</b> <b>Programmatic</b> <input type="checkbox"/> <i>Not Applicable</i>				
Monitoring Indicators		Acceptable LEA Evidence	ADE USE ONLY	
			Met Requirements Describe Evidence	Did Not Meet Requirements Describe Current Practice
1	The LEA implements procedures to address the identification of homeless children and youth according to statutory definitions. McKinney-Vento Homeless Assistance Act Section 11432(g)(1)(I)	Provide enrollment, intake, and tracking forms for all identified homeless students.  Provide notes/logs/documentation of community contacts.		
2	The LEA implements procedures to address the immediate enrollment of homeless children and youth according to statutory requirements. McKinney-Vento Homeless Assistance Act Section 722(f)(1)	Provide evidence of written procedures for enrolling homeless children.  Provide agendas, memos, and handbooks for training sessions.  Provide evidence of posters, brochures, and flyers available in each building.		
3	The LEA implements procedures to address the retention of homeless students in the school of origin. McKinney-Vento Homeless Assistance Act Section 722(g)(3)(B)	Provide the following: <ol style="list-style-type: none"> <li>1) Memos and other information explaining the rights of parents for their children to attend the school of origin</li> <li>2) Needs assessment documents</li> <li>3) District policies</li> <li>4) Tracking of transportation to school of origin</li> </ol>		

4	<p>The LEA disseminates information both internally and externally to ensure appropriate implementation of the statute.</p> <p>McKinney-Vento Homeless Assistance Act Section 11432(g)(6)(A)(v)</p>	<p>Provide communication tools for internal and external stakeholders.</p> <p>Provide agendas, sign- in sheets, and handbooks for training sessions.</p> <p>Provide evidence of posters, brochures, and flyers available in each building.</p>		
5	<p>The LEA ensures that there is coordination of programs and services to homeless students and families.</p> <p>McKinney-Vento Homeless Assistance Act Section 11432(g)(5)(D)</p>	<p>Provide completed collaboration forms for community and district coordination..</p>		
6	<p>The LEA has a system for ensuring prompt resolution of dispute.</p> <p>McKinney-Vento Homeless Assistance Act Section 11432(g)(3)(E)</p>	<p>Provide dispute resolution form and log.</p>		
7	<p>The liaison participated in professional development this year.</p> <p>McKinney-Vento Homeless Assistance Act Section 11432(g)(1)(F)(ii)</p>	<p>Provide certificates of attendance for the district liaison from the following:</p> <ol style="list-style-type: none"> <li>1) State Conference</li> <li>2) Trainings at Educational Cooperatives</li> <li>3) Other trainings</li> </ol>		

## B. Fiscal Monitoring Indicators

OVERARCHING REQUIREMENTS				
Fiscal TITLE I, PART A; TITLE I, PART D; TITLE II, PART A; TITLE III, PART A; TITLE IV, PART A; TITLE IV, PART B, TITLE V, PART B; TITLE IX, PART A				
Allocations: LEAs must ensure that site allocations are made in accordance with applicable statutory requirements. Section 1124(a)(2)(A)				
Monitoring Indicators		Acceptable LEA Evidences	ADE USE ONLY	
			Met Requirements Describe Evidence	Did Not Meet Requirements Describe Current Practice
1	Federal written procedures are in place. 2 C.F.R. §200.302(b)(7)	Provide written policies and procedures for the following in accordance with Uniform Grant Guidance: 1) Financial Management System C.F.R. 200.302(b)(1-4) 2) Cash Management System C.F.R. 200.302(6) 3) Allowability of Costs C.F.R. 200.302(6); 200.403-405 4) Procurement C.F.R. 200.318(a) 5) Conflict of Interest C.F.R. 200.318(c)(1) 6) Method of Conducting Technical Evaluations of Proposal C.F.R. 200.320(d)(3) 7) Travel C.F.R. 200.474(b) 8) Property C.F.R. 200.313		

2	Revenue Transactions for testing (sampling). 2 C.F.R. §200.302	Select a sample of revenue transactions for testing: 1) Verify source of funds is correct 2) Verify cash is receipted timely 3) Review bank statements to check for reconciliations and approvals		
3	Ensure that corrective action plan, from prior year federal audit finding, has been implemented. C.F.R. 200.511(c)	If applicable, provide evidence of implementation of corrective action plan (Examples: Written policies and procedures, training, or testing may be required for evidence)		
4	Property and Equipment 2 C.F.R. §200.313(d)(1)	1) Obtain an updated inventory listing for each Federal program. a) Review sign-out procedures b) Adequate tagging c) Benefits for the program 2) Select a sample of equipment items and verify the following: a) Allowable purchase b) Bids/quotes are obtained and retained c) SAM.gov debarment verification is maintained d) Site the equipment items and verify that they are labeled appropriately e) For any individual item of equipment costing \$5,000 or more, verify that prior approval from ADE was		

		<p>obtained or included in their approved budget</p> <p>3) Evidence that an inventory was conducted at least every two years</p> <p>4) Review the equipment listing for property disposals and ensure that ADE approval was obtained for any property with a current FMV (fair market value) of \$5,000 or more.</p> <p>5) For any property reported as lost or stolen, the district must provide insurance reports, police reports, and/or documentation of any program reimbursements.</p>		
5	<p>Procurement</p> <p>2 C.F.R. §§200.319(c) and 200.320</p>	<p>Select a sample of purchases to test and look for the following:</p> <p>1) Bids/ quotes obtained and maintained</p> <p>2) Allowable purchase</p> <p>3) SAM.gov debarment verification is maintained</p> <p>4) Proper procurement method is used</p> <p>5) Attempts to circumvent micro purchase threshold</p> <p>6) If bids or quotes were required, the lowest quote was selected</p> <p>7) Documentation is provided that indicates the item/services purchased could only be provided by one source with proper approvals.</p>		

6	Personnel 2 C.F.R. §200.430(i)	Select a sample of payroll transactions for testing: 1) Provide time sheets and verify that they are complete and signed by the employee and supervisor 2) Ensure the number of hours paid matches timesheet 3) Verify that days and hours worked are appropriate		
7	Expenditures 2 C.F.R. §200.34 2 C.F.R. §200.403(a-g) 2 C.F.R. §200.420-474	Select a sample of expenditures for testing the following: 1) Allowable cost (reasonable and necessary) 2) Incurred within the period of availability 3) Documentation of approval, matching amounts and dates, and proper coding of expenditure 4) Verify that there are no unallowed costs (Examples include recreational/entertainment items, alcohol, promotional items, late fees/interest, decorative items, and personal expenditures)  Select a sample of travel expenditures for testing and ensure that: 1) Traveler and supervisor signatures are present 2) Mileage dates are on working days and calculations of mileage are correct 3) Receipts for travel are attached to the travel reimbursement 4) Meals and lodging do not exceed Federal GSA per diems 5) Conference travel expenditures are only for the dates of the actual		

		<p>conference and do not include any travel expenses for other days of travel.</p> <p>6) Written justification for travel to conferences, which includes a statement that the individual's participation in the conference is necessary and the cost is reasonable</p>		
8	Budget 2 C.F.R. §200.308(e)	Review budgets in Indistar for allowability of expenditures and note any variances of 10% or greater total approved budget.		
9	Federal or State (ADE) Reports/ Forms/ Budgets	Provide evidence of expenditure reports for Federal programs, comparability reports, Federal applications, Federal budgets, paraprofessional reports, discretionary grants semi-annual financial reports, and annual performance reports or others upon request.		

<b>Records and Information Management:</b> LEAs must keep records that fully show the amount of federal funds, how the LEA used the funds, the total costs of Federally supported projects, the share of costs provided from other sources, records to show compliance with program requirements, and any other records needed to facilitate an effective audit. The LEA must also take reasonable measures to safeguard and protect Personally Identifiable Information (PII). Uniform Guidance 2 C.F.R. §200.303(e); 2 C.F.R. §200.333; 2 C.F.R. §200.336(a); EDGAR 34 C.F.R. §§76.730-731			
Monitoring Indicators		ADE USE ONLY	
Acceptable LEA Evidence		Met Requirements Describe Evidence	Did Not Meet Requirements Describe Current Practice
1	LEA's process to maintain and store all required records for the required time periods. 2 C.F.R. §200.333	Provide evidence of the districts record retention policy which states that all Federal program records will be maintained for a minimum of three years from the expiration of grant funds.	



<b>Maintenance of Effort and Comparability:</b> Each LEA shall have either the combined fiscal effort per student or the aggregate expenditures of the LEA and the State with respect to the provision of free public education by the agency for the preceding fiscal year was not less than 90 percent of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year. Section 8521; Each LEA shall use State and local funds in schools served under this part to provide services that, taken as a whole, are at least comparable to services in schools that are not receiving funds under this part. Section 1118(c)(1)(A)			
MONITORING INDICATORS		ADE USE ONLY	
Acceptable LEA Evidence		Met Requirements Describe Evidence	Did Not Meet Requirements Describe Current Practice
1	LEA has procedures in place if the LEA is identified as failing to provide comparable services.	Provide a written policy or procedure. In cases where Title I schools are not comparable, documentation showing adjustments to the allocation of resources that LEA made to ensure that Title I and non-Title I schools are comparable is required.	

**SUPPLEMENT NOT SUPPLANT (As applicable to Title I, Part A)**

As required by SEC. 1118 - FISCAL REQUIREMENTS of ESSA, local educational agencies shall use Federal funds received under this part (Title I Part A) only to supplement the funds that would, in the absence of such Federal funds, be made available from State and local sources for the education of students participating in programs assisted under this part, and not to supplant such funds. To demonstrate compliance with supplement/supplant, a local educational agency shall demonstrate that the methodology used to allocate State and local funds to each school receiving assistance under this part ensures that such school receives all of the State and local funds it would otherwise receive if it were not receiving assistance under this part. No local educational agency shall be required to identify that an individual cost or service supported under this part is supplemental; or provide services under this part through a particular instructional method or in a particular instructional setting in order to demonstrate such agency's compliance. As required by OMB's Uniform Grants Guidance (UGG), costs still must be reasonable, necessary, and allocable to Federal award (2 C.F.R. §§200.403, 200.404, and 200.405).

<b>Supplement not Supplant (outside of Title I):</b> The LEA must ensure that Federal program funds are used to supplement, not supplant State and local funds. ESSA §1114(a)(3)(B) ; ESSA §2301; ESSA §3115(g); ESSA §4110; ESSA §5232			
MONITORING INDICATORS		ADE USE ONLY	
		Met Requirements Describe Evidence	Did Not Meet Requirements Describe Current Practice
1	LEA implements a methodology that ensures that State and local education funds are allocated among all its schools in such a way that Title I schools receive all the funds they would receive if not Title I.	Provide written methodology documenting distribution of State and local funds showing evidence that methodology was implemented as submitted	

## **C. Performance Review - ADE Determination**

### **ADE's Determination to LEA's Grant Programmatic Administration and Fiscal Management Evaluation**

The information provided in this section is intended to help an LEA assess whether sufficient capacities, infrastructure, and resources are allocated to the management of applicable federal grants, in a manner that enables the LEA to achieve its strategic goals. Each area rating is a reflection of how the LEA is addressing fiscal and cross program requirements. ADE's analysis for each area is primarily based on evidence submitted by the LEA in the form of answers to the programmatic and fiscal questions, documents submitted by the LEA prior to the review, and the responses and evidence provided to questions during the on-site review.

#### **Met Requirements**

This section identifies those areas where the ADE has determined that the LEA has met basic requirements of grant programmatic administration and fiscal management and is implementing those requirements in a satisfactory manner. The description of satisfactory implementation by relevant area and requirement is an indication of an acceptable implementation quality level. In these areas, the ADE is not recommending or requiring the LEA to take any further action.

#### **Action Required**

This section identifies those areas where the ADE has significant compliance or quality concerns related to the LEA's grant programmatic administration and fiscal management. For those issues, the ADE will outline the current practice and the required corrective action. Documentation of required action must be provided to the ADE as outlined in the Non-Compliance letter.

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Director of Federal Program

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ADE Team Leader

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ADE Team Member

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ADE Team Member

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ADE Team Member

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ADE Team Member

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Date

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Date

#### IV. Appendix

##### A. Migrant Education Program Monitoring Tool

### ARKANSAS STATE DEPARTMENT OF EDUCATION MIGRANT EDUCATION PROGRAM ON-SITE REVIEW

<b>Reviewer's Name:</b>			
<b>Name of District:</b>			
<b>Name of Superintendent:</b>			
<b>Building(s) Visited:</b>			

Number of Participants	Total	Preschool (Ages 3-5)	Grades K-8	Grades 9-12	Out of School Youth

**Title I, Part C—Migrant Education Program  
Measurable Program Outcomes**

<b>Measurable Program Outcomes (MPOs) Literacy</b>	<b>What Tool is needed?</b>	<b>Who is Responsible?</b>	<b>When is it Administered?</b>	<b>When is it reported to the SEA or Evaluators?</b>
1.1) By the end of the 2018-19 school year, 80% of migrant students participating in an SEA-approved supplementary literacy program will show a gain of 15% between pre- and post-testing on a reliable assessment of literacy.	Pre-and Post-Assessments	Instructional Staff	Prior to and upon completion of activity	Reported to Co-op within 2 weeks of completion of post assessment. Co-op will report results to SEA by December 1 <sup>st</sup> May 1 <sup>st</sup> , and Sept. 1 <sup>st</sup>
1.2) By the end of the 2018-19 school year, 80% of migrant parents completing a survey will report receiving useful strategies to promote their child(ren)'s literacy achievement.	Parent Survey	Tutors	At PAC or parent meetings	June 1 <sup>st</sup>
1.3) By the end of the 2018-19 school year, 85% of migrant instructional staff receiving professional development on literacy instruction, EL strategies, and services for migrant students will report a gain of 15% in their knowledge/skills related to the training topic.	Survey	SEA	State Conference	Upon completion
<b>Measurable Program Outcomes (MPOs) Mathematics</b>				
2.1) By the end of the 2018-19 school year, 80% of migrant students participating in an SEA-approved supplementary math program will show a gain of 15% between pre- and post-testing on a reliable assessment of math.	Pre-and Post-Assessments	Instructional Staff	Prior to and upon completion of activity	Summer Math assessment scores reported to SEA within one week of completion. Results reported to co-op within 1 week of completion
2.2) By the end of the 2018-19 school year, 85% of migrant instructional staff receiving professional development in math will report a gain of 15% in their knowledge/skills in the training topic.	Survey	Tutors	State Conference	Upon completion at State Conference
2.3) By the end of the 2018-19 school year, 80% of migrant parents completing a survey will report receiving useful strategies and resources to promote their child(ren)'s achievement in math.	Parent Survey	SEA	PAC or parent meeting	June 1 <sup>st</sup>
<b>Measurable Program Outcomes (MPOs) High School Graduation/Services to OSYs</b>				
3.1) By the end of the 2018-19 school year, 80% of secondary migrant students who participate in a MEP sponsored credit recovery program will complete all attempted courses.	Data Reports: On Track reporting Form I-A Data PASS MIS 2000 MUA Data Report	MEP tutors and staff	Upon completion of coursework and by June 30 <sup>th</sup> of program year	On-Track – Oct 1 <sup>st</sup> and Feb 1 <sup>st</sup> MUA – June 30 <sup>th</sup> PASS – Upon completion, no later than June 30 <sup>th</sup> CSPR Data - End of January

3.2) By the end of the 2018-19 school year, 75% of secondary-aged migrant students will receive support services, and supplementary resources and supplies.	AR State Data MIS 2000	AR MEP Director Clerks/REDS	September 2018 June 2019	June 2019
3.3) By the end of the 2018-19 school year, 80% of migrant parents completing a survey will report receiving information in their home language on promoting their child (ren)'s graduation.	Parent Surveys	Clerks, tutors Co-op Directors	Spring Semester	End of Program Year
3.4) By the end of the 2018-19 school year, 75% of identified OSY will receive support services and/or educational resources and information from the MEP.	MIS 2000 OSY Reporting Form	Recruiters REDS	Ongoing Recruitment	End of Program Year
3.5) By the end of the 2018-19 school year, 85% of staff that work with secondary migrant students and receive professional development on graduation, GED, HEP, and related topics, will report a gain of 15% in their knowledge/skills in the training topic.	Survey	Co-ops/SEA	Ongoing	End of Program Year

## 1.0 LITERACY

Strategies	IMPLEMENTATION LEVEL				
	NON-EVIDENT		HIGHLY EVIDENT		
	1	2	3	4	5
1-1 <b>Provide migrant students with supplemental in-school and extended day tutoring or support in literacy during the regular school year.</b>	<ul style="list-style-type: none"> <li>• No tutoring is provided</li> <li>• No reading/literacy/pre-literacy resources</li> <li>• No participation</li> <li>• No records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Limited tutoring is provided by trained/experienced personnel to mostly large groups</li> <li>• Minimal reading/literacy/pre-literacy resources</li> <li>• Minimal participation</li> <li>• Minimal records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Approaching sufficiency in providing tutoring by trained/experienced personnel to mostly large groups</li> <li>• Some reading/literacy/pre-literacy resources</li> <li>• Some participation</li> <li>• Some records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Sufficient tutoring is provided by trained/experienced personnel one-on-one and/or in small groups</li> <li>• Sufficient reading/literacy/pre-literacy resources</li> <li>• Sufficient participation</li> <li>• Sufficient records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Extensive one-on-one tutoring is provided by trained/experienced personnel in school, before, and/or after school</li> <li>• Extensive reading literacy/pre-literacy resources</li> <li>• Extensive participation</li> <li>• Comprehensive records maintained</li> </ul>
<b>Evidence:</b>					
<b>Comments/Follow-up:</b>					
1-2 <b>Provide digital reading programs with devices to be used in the home with books that can be read in English and other languages (i.e., MyON).</b>	<ul style="list-style-type: none"> <li>• No books/access to digital reading are provided or those provided are of no interest or inappropriate</li> <li>• No records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Limited number of books are provided/access to digital reading or those provided are of minimal interest or appropriateness</li> <li>• Minimal records</li> </ul>	<ul style="list-style-type: none"> <li>• Some books/access to digital reading are provided or those provided are of some interest or appropriateness</li> <li>• Some records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Sufficient number of books/access to digital reading provided that are of interest and are appropriate</li> <li>• Sufficient records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Extensive number of books/access to digital reading provided that are of high interest and appropriate</li> <li>• Comprehensive records maintained</li> </ul>
<b>Evidence:</b>					
<b>Comments/Follow-up:</b>					



<b>1-3 Provide summer literacy instruction (i.e., SLiP into Reading).</b>	<ul style="list-style-type: none"> <li>• No access to summer literacy instruction or instruction is not inappropriate</li> <li>• No records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Minimal access to summer literacy instruction or instruction is minimally appropriate</li> <li>• Minimal records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Some access to summer literacy instruction or instruction is somewhat appropriate</li> <li>• Some records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Sufficient access to summer literacy instruction</li> <li>• Access to summer literacy instruction is sufficient and appropriate</li> <li>• Sufficient records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Extensive access to summer literacy instruction</li> <li>• Access to summer literacy instruction is extensive and highly appropriate</li> <li>• Extensive records maintained</li> </ul>
<b>Evidence:</b>					
<b>Comments/Follow-up:</b>					

Strategies	IMPLEMENTATION LEVEL				
	NON-EVIDENT ← ————— → HIGHLY EVIDENT				
	1	2	3	4	5
1-4 <b>Provide SEA-approved supplemental literacy services to migrant students in non-project schools.</b> *	<ul style="list-style-type: none"> <li>• No access to reading/literacy services</li> <li>• No records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Minimal access to reading/literacy services</li> <li>• Minimal records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Some access to reading/literacy services</li> <li>• Some records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Sufficient access to reading/literacy services</li> <li>• Sufficient records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Extensive access to reading/literacy services</li> <li>• Extensive records maintained</li> </ul>
Evidence: N/A					
Comments/Follow-up:					
1-5 <b>Provide high interest reading materials through books, digital reading programs, magazines, etc.</b>	<ul style="list-style-type: none"> <li>• No access to reading/literacy services</li> <li>• No records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Minimal access to reading/literacy services</li> <li>• Minimal records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Some access to reading/literacy services</li> <li>• Some records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Sufficient access to reading/literacy services</li> <li>• Sufficient records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Extensive access to reading/literacy services</li> <li>• Extensive records maintained</li> </ul>
Evidence:					
Comments/Follow-up:					
1-6 <b>Provide relevant and ongoing professional development in literacy to MEP staff.</b> *	<ul style="list-style-type: none"> <li>• No staff training on reading/literacy provided</li> <li>• No records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Minimal staff training on reading/literacy provided</li> <li>• Minimal records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Some staff training on reading/literacy provided</li> <li>• Some records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Sufficient staff training on reading/literacy provided</li> <li>• Sufficient records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Extensive staff training on reading/literacy provided</li> <li>• Extensive records maintained</li> </ul>
Evidence: N/A					
Comments/Follow-up:					
1-7 <b>Provide support for parents to promote the achievement of their children in literacy (e.g., PAC and parent meetings focused on teaching parents how to help their children in school, instructional home visits, etc.).</b>	<ul style="list-style-type: none"> <li>• No parent support provided</li> <li>• No materials distributed to parents</li> <li>• No records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Minimal parent support provided</li> <li>• Minimal materials distributed to parents</li> <li>• Minimal records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Some parent support provided</li> <li>• Some materials distributed to parents</li> <li>• Some records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Sufficient parent support provided</li> <li>• Sufficient materials distributed to parents</li> <li>• Sufficient records of parent participation and events maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Extensive parent support provided</li> <li>• Extensive materials distributed to parents</li> <li>• Comprehensive records of parent participation and events maintained</li> </ul>

<b>Evidence:</b>
<b>Comments/Follow-up</b>

*\*Co-op provided*

## 2.0 MATHEMATICS

Strategies	IMPLEMENTATION LEVEL				
	NON-EVIDENT		HIGHLY EVIDENT		
	1	2	3	4	5
2-1 <b>Provide migrant students with supplemental in-school and extended day tutoring and support in mathematics during the regular school year.</b>	<ul style="list-style-type: none"> <li>• No tutoring is provided</li> <li>• No math resources</li> <li>• No participation</li> <li>• No records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Limited tutoring is provided by trained/experienced staff to mostly large groups</li> <li>• Minimal math resources</li> <li>• Minimal participation</li> <li>• Minimal records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Approaching sufficiency in providing tutoring by trained/experienced personnel to mostly large groups</li> <li>• Some math resources</li> <li>• Some participation</li> <li>• Some records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Sufficient tutoring is provided by trained/experienced personnel one-on-one and/or in small groups</li> <li>• Sufficient math</li> <li>• Sufficient participation</li> <li>• Sufficient records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Extensive one-on-one tutoring is provided by trained/experienced personnel in school, before, and/or after school</li> <li>• Extensive math</li> <li>• Extensive participation</li> <li>• Comprehensive records maintained</li> </ul>
Evidence:					
Comments/Follow-up:					
2-2 <b>Provide summer math instruction (e.g., Summer Math, Math Makes Cents, Math MATTERS) in the summer.</b>	<ul style="list-style-type: none"> <li>• No math resources are provided or those provided are of no interest or inappropriate</li> <li>• No records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Limited number of math resources are provided or those provided are of minimal interest or appropriateness</li> <li>• Minimal records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Some math resources are provided or those provided are of some interest or appropriateness</li> <li>• Some records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Sufficient number of math resources provided that are of interest and are appropriate</li> <li>• Sufficient records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Extensive math resources are provided that are of high interest and appropriate</li> <li>• Extensive records maintained</li> </ul>
Evidence:					
Comments/Follow-up:					
2-3 <b>Provide SEA-approved services in math to migrant students in non-project schools</b>	<ul style="list-style-type: none"> <li>• No access to services</li> <li>• No records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Minimal access to services</li> <li>• Minimal records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Some access to services</li> <li>• Some records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Sufficient access to services</li> <li>• Sufficient records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Extensive access to services</li> <li>• Extensive records maintained</li> </ul>
Evidence: N/A					
Comments/Follow-up:					

Strategies	IMPLEMENTATION LEVEL				
	NON-EVIDENT		HIGHLY EVIDENT		
	1	2	3	4	5
2-4 <b>Provide supplemental math materials and instructional resources (e.g., digital programs, manipulatives) at appropriate grade levels.</b>	<ul style="list-style-type: none"> <li>No math materials/resources are provided or those provided are of no interest or inappropriate</li> <li>No records maintained</li> </ul>	<ul style="list-style-type: none"> <li>Limited number of math materials/resources are provided or those provided are of minimal interest or appropriateness</li> <li>Minimal records maintained</li> </ul>	<ul style="list-style-type: none"> <li>Some math materials/resources are provided or those provided are of some interest or appropriateness</li> <li>Some records maintained</li> </ul>	<ul style="list-style-type: none"> <li>Sufficient number of math materials/resources provided that are of interest and are appropriate</li> <li>Sufficient records maintained</li> </ul>	<ul style="list-style-type: none"> <li>Extensive math materials/resources are provided that are of high interest and appropriate</li> <li>Extensive records maintained</li> </ul>
Evidence:					
Comments/Follow-up:					
2-5 <b>Provide relevant and ongoing professional development in math to MEP staff.</b>	<ul style="list-style-type: none"> <li>No staff training on math provided</li> <li>No records maintained</li> </ul>	<ul style="list-style-type: none"> <li>Minimal staff training on math provided</li> <li>Minimal records maintained</li> </ul>	<ul style="list-style-type: none"> <li>Some staff training on math provided</li> <li>Some records maintained</li> </ul>	<ul style="list-style-type: none"> <li>Sufficient staff training on math provided</li> <li>Sufficient records maintained</li> </ul>	<ul style="list-style-type: none"> <li>Extensive staff training on math provided</li> <li>Extensive records maintained</li> </ul>
Evidence:					
Comments/Follow-up:					
2-6 <b>Provide support for parents to promote the achievement of their children in math (e.g., PAC and parent meetings focused on teaching parents how to help their children in school, instructional home visits, etc.).</b>	<ul style="list-style-type: none"> <li>No parent support provided</li> <li>No materials distributed to parents</li> <li>No records maintained</li> </ul>	<ul style="list-style-type: none"> <li>Minimal parent support provided</li> <li>Minimal materials distributed to parents</li> <li>Minimal records maintained</li> </ul>	<ul style="list-style-type: none"> <li>Some parent support provided</li> <li>Some materials distributed to parents</li> <li>Some records maintained</li> </ul>	<ul style="list-style-type: none"> <li>Sufficient parent support provided</li> <li>Sufficient materials distributed to parents</li> <li>Sufficient records of parent participation and events maintained</li> </ul>	<ul style="list-style-type: none"> <li>Extensive parent support provided</li> <li>Extensive materials distributed to parents</li> <li>Comprehensive records of parent participation and events maintained</li> </ul>
Evidence:					
Comments/Follow-up:					



\*Co-op provided

### 3.0 HIGH SCHOOL GRADUATION/OSY

Activities	Implementation Level				
	NON-EVIDENT ← <span style="display: inline-block; width: 100%; height: 10px; background: linear-gradient(to right, #ccc, #ccc);"></span> → HIGHLY EVIDENT				
	1	2	3	4	5
<b>3-1 Provide credit recovery opportunities through MUA, PASS, and the LEA along with tutoring where needed</b>	<ul style="list-style-type: none"> <li>• No credit accrual options offered</li> <li>• No student participation</li> <li>• No records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Minimal credit accrual options offered</li> <li>• Minimal student participation</li> <li>• Minimal records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Some credit accrual options offered</li> <li>• Some student participation</li> <li>• Some records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Sufficient credit accrual options offered</li> <li>• Sufficient student participation</li> <li>• Sufficient records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Extensive credit accrual options offered</li> <li>• Extensive student participation</li> <li>• Comprehensive records maintained</li> </ul>
Evidence:					
Comments/Follow-up:					
<b>3-2 Provide information and counseling to secondary migrant students, parents, and OSY, including those in non-project schools, on high school graduation, and college and career opportunities (e.g., On Track, PASS courses, Moving Up Arkansas, Scholarships, CAMP, ACT prep, concurrent credit, MSAC, AMESLA, summer programs at local colleges).</b>	<ul style="list-style-type: none"> <li>• No guidance opportunities provided</li> <li>• No documentation of college and career readiness opportunities</li> <li>• No records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Minimal guidance opportunities provided</li> <li>• Minimal documentation of college and career readiness opportunities</li> <li>• Minimal records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Some guidance opportunities provided</li> <li>• Some documentation of college and career readiness opportunities</li> <li>• Some records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Sufficient guidance opportunities provided</li> <li>• Sufficient documentation of college and career readiness opportunities</li> <li>• Sufficient records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Extensive guidance opportunities provided</li> <li>• Extensive documentation of college and career readiness opportunities</li> <li>• Comprehensive records maintained</li> </ul>
Evidence:					
Comments/Follow-up:					

<b>3-3 Identify and provide supplemental health services with a focus on academic performance</b>	<ul style="list-style-type: none"> <li>• No access to supplemental health services</li> <li>• No records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Minimal access to supplemental health services</li> <li>• Minimal records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Some access to supplemental health services</li> <li>• Some records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Sufficient access to supplemental health services</li> <li>• Sufficient records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Extensive access to supplemental health services</li> <li>• Extensive records maintained</li> </ul>
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and high school graduation.					
Evidence:					
Comments/Follow-up:					

Services	Implementation Level				
	NON-EVIDENT   HIGHLY EVIDENT				
	1	2	3	4	5
3-4 <b>Provide services for project and non-project students that lead to developing the skills needed to further the education of high school and OSY (e.g., language, technology/computer, and supplementary ESL).</b>	<ul style="list-style-type: none"> <li>• No access to support services</li> <li>• No secondary-aged student participation</li> <li>• No records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Minimal access to support services</li> <li>• Minimal secondary-aged student participation</li> <li>• Minimal records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Some access to support services</li> <li>• Some secondary-aged student participation</li> <li>• Some records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Sufficient access to support services</li> <li>• Sufficient secondary-aged student participation</li> <li>• Sufficient records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Extensive access to support services</li> <li>• Extensive secondary-aged student participation</li> <li>• Extensive records maintained</li> </ul>
Evidence:					
Comments/Follow-up:					
3-5 <b>Provide professional development for cooperative staff and LEAs on strategies for appropriate instructional and counseling services on graduation/GED for OSY.</b> *	<ul style="list-style-type: none"> <li>• No staff/LEAs training provided</li> <li>• No records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Minimal staff training provided</li> <li>• Minimal records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Some staff training provided</li> <li>• Some records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Sufficient staff training provided</li> <li>• Sufficient records maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Extensive staff training provided</li> <li>• Extensive records maintained</li> </ul>
Evidence: N/A					
Comments/Follow-up:					

\*Co-op provided



## **B. Desk Monitoring Checklists**

Desk monitoring entails a review of LEA documents, records, and needs assessment information to determine the level of compliance with the law.

### **Title I, Part A Improving the Academic Achievement of the Disadvantaged**

- ☐ Description of certification status of all staff in Title I schools
  - certified
  - paraprofessional
- ☐ Description of equity plan for low-income and minority students
- ☐ Description of notification process
  - Right to Know Letter (parent may request qualifications of teachers/paraprofessionals)
  - Timely Notice Letter (parent notification of child being taught by non-certified teacher for 4 or more weeks)
- ☐ Description of effective use of schoolwide programs which includes:
  - fund consolidation
  - fund coordination
  - waiver letter for Targeted Assistance school
  - description of school's 4 components
  - description of evidence-based strategies being implemented
  - plans LEA has for component review
  - description of Title I efforts toward school improvement
- ☐ Description of Targeted Assistance program instructional strategies which includes:

- providing extended learning time
  - providing an accelerated, high quality curriculum
  - minimizing removal of students from regular class instruction for additional assistance
  - selection process of students (include criteria for ranking)
  - timeline of services
- ❑ Description of compliance with Section 1116, Parent and Family Engagement Plan requirements which includes:
- date of last review
  - involvement of parents in development of plan
  - assurance that all Title I schools have a school level plan
  - parent input on uses of parental involvement set-aside funds
  - process for monitoring funds
- ❑ Description of Equitable Services to private schools which includes:
- process for inviting private schools for consultation
  - reaching agreement on providing equitable services
  - transmitting results to State Ombudsman
  - ongoing consultation process
  - ensuring teachers and families of private school students participate on equitable basis in activities
  - evaluation of Title I serving private school students
- ❑ Description of how Title I supports coordinated effort in LEA to address homeless students
- ❑ Describe method for determining required set-aside for homeless students

- ❑ Description of how LEA collaborates with State or local welfare agency on development of procedures and practices to ensure foster care children's educational stability
- ❑ Title I Comparability
  - Data entered
- ❑ Title I Methodology
  - Check methodology of state and local funds

### **Parent and Family Engagement, Title I, Part A**

Completed application with the following components:

- ☐ Description of plan dissemination
- ☐ Date of district Annual Title I Meeting
- ☐ Date of Parent and Family Engagement Review of Effectiveness Meeting
- ☐ Reservation of Parent and Family Engagement 1% Set-aside funds
- ☐ Coordination of activities with other programs including preschool programs
- ☐ Contact information for the Parent facilitator in each Title I building
- ☐ List of Parent and Family Engagement Committee Members. (Parents Identified)
- ☐ Description of how parents are involved in school review and improvement process
- ☐ School site visits to observe Parent and Family Engagement activities
- ☐ Staff professional development
- ☐ Communicating with parents in native language
- ☐ Monitor each Title I Schools for:
  - current building plan dissemination
  - flexible meeting times
  - informational parent meetings
  - current school-parent compact
  - provide materials and training for parents to help students at home
- ☐ Identify barriers that hinder greater Parent and Family Engagement
- ☐ Provide information about educational goals

- ☐ Support of parent engagement groups
- ☐ Annual Parent Survey
- ☐ School-Parent Compact
- ☐ Support of Parent and Family Engagement activities in Title I schools
- ☐ Annual Evaluation

**Paraprofessionals, Title I, Part A**

Completed application with the following components:

- ☐ Attestation Form
  - Affirmation of Consultation or evidence of three (3) attempts to contact
- ☐ Paraprofessional roster
- ☐ Required attachments
  - Proof of highly qualified status

**Neglected, Title I, Part A**

Completed application with the following components:

- ☐ Budget information including correct allocation and funds brought forward
- ☐ Budget justification/description
- ☐ Detailed program description
- ☐ Positions with Full Time Employees (FTE)

## **Title I, Part D Delinquent**

Completed application with the following components:

- ☐ All required applicant information
- ☐ Completion of Statement of Assurances and Signatures
- ☐ Program information includes:
  - Detailed program description
  - Needs assessment summary
  - Detailed information on goals
  - Evidence that education was comparable to public school
  - IEP information
  - Community partnerships were listed and specific
  - Parents information sharing
  - Professional development activities are described
  - A list of alternative placements for the students
- ☐ Transitional Plan includes specific information
- ☐ Third party contracts/ agreements
- ☐ Budget information and justification
- ☐ Evaluation includes all components

## **Title II, Part A**

### **Preparing, Training, and Recruiting High Quality Teachers, Principals and other School Leaders**

Completed application with the following components:

- ☐ activities aligned to state standards, assessments, and curriculum;
- ☐ plan for impact on achievement and achievement gap;
- ☐ description of how district will target funds;
  - lowest proportion of highly qualified teachers
  - largest class size
  - schools in need of support
- ☐ description of professional development activities;
- ☐ stakeholder engagement actions;
- ☐ description of needs assessments;
- ☐ private school consultation;
- ☐ teacher recruitment and retention plans;
- ☐ equitable services plan;
- ☐ class size reduction plan;
- ☐ completed budget transfers



### **Title III, Part A**

#### **Language Instruction for English Learners and Immigrant Students**

Completed application with the following components:

- ☐ Description of the programs and activities proposed to be developed, implemented, and administered by the LEA for ELs and if needed due to failing programs, description of how the LEA will restructure, reform, and upgrade all relevant programs, activities and operations relating to language instructional education programs and academic content instruction.
- ☐ Description of how the LEA will promote parental and community participation in programs for limited English proficient children.
- ☐ Description of how the LEA assures that a plan/procedures for the participation of teachers, researchers, school administrators, and parents, and, if appropriate, with education-related community groups, nonprofit organizations, and institutions of higher education, are meeting the needs of English Learners.
- ☐ Description of how language instructional education programs carried out by the LEA will ensure that limited English proficient children being served by the programs develop English proficiency.
- ☐ Ensure that reimbursements match the subgrantee.

### **Recent Immigrant Grant**

Completed application with the following components:

- ☐ Description of Immigrant children and youth:
  - Ensure children are between the ages of 3 through 21
  - Were not born in the U.S. or any U.S. Territory
  - Have not attended U.S. schools for more than three full academic years
  
- ☐ Description of LEA required narrative describing how they propose to serve immigrant children and youth, and their families, for the school year in which they receive an allocation. The narrative must align to a budget that is also submitted annually.
  
- ☐ Ensure that reimbursements match the subgrantee.

**Title IV, Part A**  
**Student Support and Academic Enrichment**

Checklist for completing Title IVA-Student Support and Academic Support:

- ☐ All required items are completed on grant application
- ☐ Indication as to whether the funds are being transferred or an application
- ☐ Carryover and allocation amounts are correct
- ☐ Budget summary has a description; the amount budgeted for expenditures and a line item function (Review materials and supplies, equipment, travel cost, conference, etc.)
- ☐ Any personnel budgeted
- ☐ Indirect cost included in administration cost
- ☐ Stakeholder engagement is checked on the form
- ☐ Needs assessment Summary for grants over \$30,000 is provided along with date of document
- ☐ Internet Safety policy is checked on form
- ☐ Private School consultation is checked on form

**Title IV, Part B**  
**21<sup>st</sup> Century Community Learning Centers (21<sup>st</sup> CCLC)**

Desk monitoring involves a review of documentation submitted to program staff or uploaded to Indistar each month and the following:

- ☐ Budget is submitted and approved
- ☐ Monthly expenditures are submitted monthly and do not exceed individual line item amounts
- ☐ General expenditures
  - Summary page for each budget line item
  - Receipts match summary and are itemized
  - Each expenditure is reasonable and necessary and aligned to program activities
- ☐ Salary expenditures
  - Summary page for all salaries
  - Timesheet match summary
  - Hours worked occur before or after school hours
- ☐ Inventory list is updated with current purchases
- ☐ Required reports are completed and submitted

**Title V**  
**Rural Education Achievement Program (REAP)**  
**Rural Low Income Schools**

Completed application with the following components:

- ☐ Evidence of plan including allowable expenditures
- ☐ Completed budget with the following components:
  - Budget information including correct allocation and funds brought forward
  - Budget justification/description
- ☐ Reimbursement approval:
  - Reimbursement approval for finance

**Title IX, Part A  
McKinney-Vento  
Education for Homeless Children and Youth**

Completed application with the following components:

- ☐ enrollment residency questionnaire;
- ☐ LEA board policies related to the EHCY program, including the dispute policy;
- ☐ agendas and participant logs for training;
- ☐ phone and email logs for tracking barriers;
- ☐ brochures, flyers, resource lists that are given to identified families and youth or a link to a web page that includes information for homeless parents and youth;
- ☐ Title I, Part A set-aside amount, including how the amount was determined and how the funds will be used;
- ☐ records of transportation provided for homeless children and youth to and from the school of origin;
- ☐ logs/agendas for collaborative activities with community agencies;
- ☐ informal and formal agreements with agencies;
- ☐ data and needs assessment documents; and

**Grantees Only**

- ☐ the LEA's McKinney-Vento subgrant application, budget logs, and end-of-year reports, if the LEA has a subgrant.(  
This information is required by each grantee mid-year and at the end of the year)

### **Federal Programs Fiscal Management**

Review of budgets in Federal Grants Management System and budget worksheets for the following:

- ☐ Funds budgeted
- ☐ Indirect cost budgeted
- ☐ Homeless set aside
- ☐ Parent and Family Engagement Set aside
- ☐ Private School Set aside
- ☐ Title I Neglected Set aside
- ☐ Rank order is correct on method of order
- ☐ Rank order amounts agrees with budget worksheet
- ☐ Capital outlay items coding in budget worksheet
- ☐ Transfers within budget sources
- ☐ Actual budgets versus budget worksheet
- ☐ Items not budgeted with expenditures
- ☐ YTD expenditures reviewed per upload dates
- ☐ Descriptions not included per budget line item and programs
- ☐ Descriptions per business managers on line items (Examples: meals, capital outlay, etc.)
- ☐ Budget worksheets are allowable budgeted items
- ☐ Payment of expenditures
  - All LEA budget worksheets and FGM System is submitted and approved before payments are made to any fund

☐ Indistar Checklist

- Assurances signed and dated



### C. Programmatic Risk Analysis

#### ARKANSAS DEPARTMENT OF EDUCATION (ADE) Programmatic Risk Analysis Form – Federal

<b>LEA Name:</b>
<b>Grant Performance Period:</b>
<b>Date of Assessment:</b>

Criteria		Risks	Value	Score	Comments
<i>Not applicable = 0</i>					
1	LEA has an audit from private auditor	<b>Low Risk:</b> First year private audit	10		
		<b>High Risk:</b> Two or more years private audit	25		

2	LEA has new superintendent	<b>Low Risk:</b> New to district	5		
		<b>High Risk:</b> New superintendent	10		
3	LEA has new business manager	<b>Low Risk:</b> New to district	5		
		<b>High Risk:</b> New business manager	10		
4	LEA has new federal programs coordinator	<b>Low Risk:</b> New to district	5		
		<b>High Risk:</b> New federal programs coordinator	10		
5	District is in fiscal distress or early intervention		15		
6	Repeat Federal audit findings		15		
7	LEA has not met carryover requirements (Title I - 15%, 1003 - 5%, and Title V - 5%)		10		
8	District had unspent grant funds that were returned		10		

9	Late submission of any budget, report, form, etc.		10		
10	Same desk audit finding in multiple years		10		
11	Previous audit finding from any fund		5		
12	Significant management letter findings from audit reports		5		
13	No on-site monitoring in the last five years		5		
14	Comprehensive Support School(s)		5		
15	Unallowable expenditures as noted in Indistar uploads		5		
		Total Score	150		

Total Score:	Low Risk	35 and below
	High Risk	40 and above

Assessment performed by: (ADE Program Staff Names and Title)	
Date:	

**ARKANSAS DEPARTMENT OF EDUCATION  
21<sup>st</sup> CCLC Programmatic Risk Analysis Form**

Grantee:
Grant Performance Period:
Date of Assessments:

	CRITERIA	VALUE	SCORE	COMMENTS
1	New Grantee	10		
2	Accusation of wrongdoing	15		
3	Carry over exceeded 25% of prior year budget	20		
4	Late submissions of budgets, expenditure documentation or reports	25		
5	Recipient of multiple grants in one year	30		
TOTAL SCORE		100		

Total Score:	Low Risk	0 - 10
	Medium Risk	11 - 49
	High Risk	50 - 100

Assessment performed by: (ADE Program Staff Names and Title)	
Date:	

**D. Title II, Part A (Commissioner's Memo COM-18-077)**

Arkansas Department of Education Class Size Reduction and Professional Development Guidance (Title II, Part A)

**Memo Information**

**Memo Number** COM-18-077

**Memo Date** 4/2/2018

**Memo Type** Regulatory

**Section** Public School Accountability

**Regulatory Authority** Every Student Succeeds Act

**Response Required** NO

**Attention** Federal Programs; Superintendents; Principals

**Primary Contact Information**

**Name** Rick Green

**Phone Number** 501-682-4373

**Email** [rick.green@arkansas.gov](mailto:rick.green@arkansas.gov)

**Memo Text**

The Every Student Succeeds Act (ESSA) of 2015 requires that when using Title II, Part A funds for professional development and class size reduction, a State Education Agency (SEA), Arkansas Department of Education (ADE), may require a Local Education Agency (LEA) to only use Title II, Part A funds on evidence-based activities.

ADE will move forward on class size reduction in the following way:

2018-2019 school year: a district will be required to show on a spreadsheet in Indistar that it is using its Title II, Part A funds for class size reduction in Grades K-3. The LEA must also explain how much it is reducing the student/teacher ratio with the goal of moving to a ratio of no greater than 17:1 for the 2019-2020 school year. A district that seeks to use its Title II, Part A funds for class size reduction for positions outside of Grades K-3 must submit to the ADE a rationale that includes a well-defined logic model or theory of action supported by research and a description of the effort(s) underway by the LEA or outside research organization to determine their effectiveness.

2019-2020 school year: a district will use the spreadsheet in Indistar to show that it has reduced all class sizes where Title II, Part A funds are used in K-3 to no greater than a 17:1 student/teacher ratio.

To utilize Title II, Part A funds for professional development, the professional development must include the following features and be evidence-based:

1. Content Focused;
2. Incorporate active learning utilizing adult learning theories;
3. Supports collaboration, typically in job-embedded contexts;
4. Uses models and modeling of effective practice;
5. Provides coaching and expert support;
6. Offers opportunities for feedback and reflection; and
7. Is of sustained duration.

Information for best practices and resources for using evidence can be found on the What Works Clearinghouse website <https://ies.ed.gov/ncee/wwc/> and the attached document on this memo.

Your plans for professional development activities must be clearly outlined in your Title II, Part A application in Indistar.

Any questions may be directed to Rick Green, Program Administrator, Arkansas Department of Education [rick.green@arkansas.gov](mailto:rick.green@arkansas.gov) or 501-682-4373.

**Attachments**

<http://adecm.arkansas.gov/Attachments/COM-18-077--essatitleiipartaguidance.pdf>